

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAIGE A. THOMPSON,

Defendant.

NO. CR19-159 RSL

GOVERNMENT'S PROPOSED VOIR DIRE

The United States of America respectfully requests that the following questions be included in the voir dire of potential jurors in the above-captioned case:

Connections with Law Enforcement/Criminal Defense/Courts

1. Is there anyone here who has ever worked for law enforcement?
2. Is there anyone here who has ever been in the military?
3. Is there anyone here who has a close friend or family member who has worked as a police officer, correctional officer, or in law enforcement?
4. Do any of you work or have you worked for an agency or firm that represents criminal defendants?
5. Do any of you have a close friend or family member who works or has worked for an agency or firm that represents criminal defendants?
6. Have any of you received any training in the law?

- 1
- 2 7. Do any of you work or have you worked for the courts?
- 3 8. Do any of you have close friends who have worked for the courts?
- 4
- 5 9. Have any of you ever served on a civil jury before?
- 6 10. Have any of you ever served on a criminal jury before?
- 7 11. Of those of you who have been on a criminal jury, is there anyone whose jury
- 8 was not able to reach a verdict?
- 9 12. Of those of you who have served on a jury before, whether a civil or criminal
- 10 jury, were you ever a foreperson of that jury?
- 11 13. Have any of you ever served on a grand jury before?
- 12

13 **Disputes with Federal Government**

- 14 14. Have any of you ever been in a dispute with the federal government over any
- 15 issue?
- 16 15. If so, was the dispute resolved to your satisfaction?
- 17 16. Do any of you have any close friends or relatives that have been in a dispute
- 18 with the federal government?
- 19 17. Was the dispute resolved to your friend or relative's satisfaction?
- 20

21 **Positive/Negative Experiences with Law Enforcement**

- 22 18. Have any of you had a particularly positive or negative experience with law
- 23 enforcement?
- 24 19. Do any of you have any positive or negative views about the following law
- 25 enforcement agencies:
 - 26 • Federal Bureau of Investigation (FBI)?
 - 27 • The United States Secret Service?
- 28 20. Is there anyone here who has ever been arrested either rightly or wrongly?
- 21 21. Do any of you have any relatives or close friends who have been arrested either
- rightly or wrongly?

- 1
- 2 22. Is there anyone here who has ever been unjustly accused of a crime, even if the
- 3 accusation was unconfirmed, or made by someone other than law enforcement or
- 4 the government?
- 5 23. Have any of you had a close friend or relative who has ever been accused of a
- 6 crime unofficially, rightly or wrongly?
- 7 24. Has anyone here ever spent time in a jail or prison, for any reason?

8 **Media**

- 9 25. This case involves a breach of Capital One's computers, and those of other
- 10 Amazon Web Services clients, in 2019. Certain aspects of this case were
- 11 reported in the media, including television news and newspapers. Have any of
- 12 you watched or read anything about this case?
- 13 26. If you have seen or heard media reports about this case, will you be able to
- 14 disregard what you may have seen or heard and decide the case solely on the
- 15 evidence presented in the trial and the instructions I will provide to you?

16 **Government Prosecution Team/Defense Team/Witnesses**

- 17 27. Does anyone know any of the attorneys for the United States: Andrew Friedman,
- 18 Jessica Manca, or Tania Culbertson?
- 19 28. Does anyone know the case agent, FBI Agent Joel Martini?
- 20 29. Does anyone know any of the defense attorneys: Mo Hamoudi, Nancy Tenney,
- 21 Christopher Sanders, Brian Klein, Melissa Meister, or Emily Stierwalt?
- 22 30. Have any of you had any dealings with the law firm Waymaker, LLP?
- 23 31. Do any of you know any of the following individuals? (Please read the
- 24 government's witness list, as well as defense's witness list).

25 **Defendant/Victims**

- 26 32. The defendant in this case is Paige Thompson. Do you know, or have you had
- 27 any dealings, personal or business, with Paige Thompson or with any family
- 28 members of Paige Thompson?

- 1 33. Have you, or anybody close to you, worked for any of the following companies?
2 • Amazon or Amazon Web Services
3 • Capital One Financial Corporation
4 • Digital.ai
5 • Arxan Technologies, Inc.
6 • Apperian
7 • Bitglass
8 • Forcepoint
9 • Enghouse Interactive, Inc.
10 • Survox
11 • 42 Lines, Inc.

12 34. Do you have any strong feelings about Amazon, either positive or negative?

13 35. Do you have any strong feelings about banks or financial institutions?

14 36. Do you have any strong feelings about Capital One, either positive or negative?

15 37. Have you ever had a Capital One credit card, or have you ever applied for a
16 Capital One credit card?

17 38. Since 2019, have you received any notice from any bank or other company that
18 your personal identifying information has been stolen or otherwise
19 compromised?

20 **Technology Experience**

21 39. Do you have specialized training, skills, or experience with technology, such as
22 cloud computing, computer hardware, software applications, or cybersecurity?

23 40. Have you ever used bitcoin, Ether, monero, or any other type of cryptocurrency?

24 **Ability to Serve as a Juror**

25 41. This trial may last two to three weeks. Do any of you have a medical or physical
26 condition that would require accommodation if you were selected as a juror?

27 42. Do any of you have or anticipate any family or employment-related issues
28 needing your immediate attention that would cause you to not be able to
concentrate on the proceedings in court for an extended period of time?

1 43. Do any of you have any religious, moral, or philosophical beliefs that prevent
2 you from passing judgment on others?

3 44. Do any of you think, as a matter of conscience, that you might not convict a
4 defendant of a crime even though the evidence proved that defendant guilty
5 beyond a reasonable doubt?

6 45. At the end of the case, I'll be instructing you on the law to be applied. Is there
7 anyone here who believes they cannot follow my instructions, even if they are
8 different from what you personally believe the law should be?

9 46. Can you read English language documents without difficulty?

10 47. Can any of you think of any reason that would prevent you from being able to
11 render a fair and impartial verdict?

12 Respectfully submitted: May 24, 2022.

13 Respectfully submitted,

14
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16 United States Attorney

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